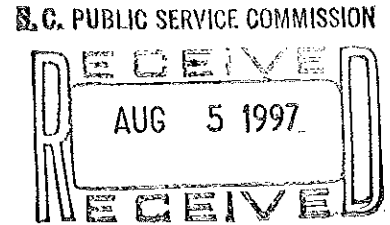


1 **PREPARED**
2 **TESTIMONY OF EDWARD T. CONNELL**
3 **FOR**
4 **DUKE ENERGY CORPORATION**
5 **SCPSC DOCKET NO. 97153-E**
6

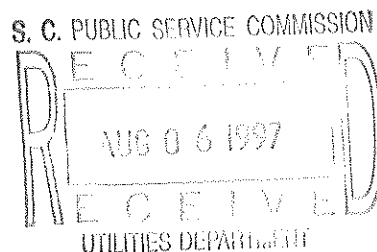


7 **Q. PLEASE STATE YOUR NAME, ADDRESS AND POSITION WITH DUKE**
8 **ENERGY CORPORATION.**

9 **A. My name is Edward T. Connell and my business address is Post Office Box**
10 1007, Charlotte, North Carolina 28201-1007. I am a registered land surveyor
11 licensed by the State of South Carolina, License 15794, and I am employed
12 by Duke Energy Corporation's Facilities and Real Estate Services. My
13 current responsibilities include general supervisory tasks, including the
14 supervision of drawings, field surveying, and registered and non-registered
15 survey workers.

16 **Q. STATE BRIEFLY YOUR EDUCATIONAL BACKGROUND AND**
17 **PROFESSIONAL AFFILIATIONS.**

18 **A. I am a graduate of the Stanly County Community College with an Associate**
19 Degree in land surveying. I am a Registered Land Surveyor in North
20 Carolina, South Carolina and Tennessee. I am a member of the North



1 Carolina, South Carolina and Tennessee Society of Surveyors and the
2 American Congress of Surveying and Mapping.

3 **Q. PLEASE DESCRIBE YOUR BUSINESS BACKGROUND AND**
4 **EXPERIENCE.**

5 **A.** I began my employment with Duke in the Real Estate Department on
6 November 28, 1983, as a rod man and eventually progressed through
7 various promotions until I attained my present position as survey supervisor
8 in 1990.

9 **Q. MR. CONNELL, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS**
10 **COMMISSION ?**

11 **A.** No.

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 **A.** The purpose of my testimony is to respond, on behalf of Duke, to testimony
14 and exhibits prepared and submitted on behalf of Blue Ridge Electric
15 Cooperative, Inc., which relates to the location of certain Duke Energy
16 Corporation electric conductors located in Oconee County, South Carolina,
17 the relationship of those conductors to a territorial assignment map filed with
18 this Commission in Docket No. 15,972, captioned "IN RE: Joint Application
19 for Territory Assignment in Oconee County, South Carolina, hereinafter
20 'Joint Application'" and the relationship of those lines to a proposed 25,000
21 square foot structure known to me as the proposed Nason Corporation
22 building.

1 **Q. MR. CONNELL, PLEASE EXPLAIN WHAT STEPS YOU TOOK IN ORDER**
2 **TO MAKE THE DETERMINATION WHICH YOU DESCRIBED IN ANSWER**
3 **TO THE PREVIOUS QUESTION.**

4 **A.** On or about April 17, 1997, I, or individuals working under my immediate
5 supervision, went to a site in Oconee County, South Carolina to determine
6 the location of a Duke Power Company 44 kV line designated as the Bear
7 Swamp 44 kV Line (Line Index No. 4W803) by Duke Power Company. I
8 then located the Bear Swamp 44 kV Line (Line Index No. 4W803) and
9 located a site for a proposed 25,000 square foot building which is to be built
10 by the Nason Company based on a site plan drawing provided to me by Site
11 Design, Inc., 110 East Stone Avenue, Greenville, South Carolina. Then we
12 located the proposed building site in relation to the Bear Swamp 44 kV Line
13 (Line Index No. 4W803) described above and overlaid the site plans for the
14 proposed building belonging to the Nason Company. After that we next
15 located a 100 kV line designated as Line Index No. 1W403 and offset it 300
16 feet from the center line of the 100 kV line and imposed it on the drawing to
17 produce a line location map designated as Exhibit 1 attached to my affidavit
18 previously filed with the Commission. Finally, based on the specification
19 drawings for the 100 kV line, the distance from the conductor hung on the
20 western side of the 100 kV tower was determined and imposed on the
21 previous drawing designated as Exhibit 1. This distance was offset 300 feet
22 and superimposed on the original drawing to show the distance from the

1 location of the western conductor and was attached as Exhibit 2 to my
2 affidavit previously filed with the Commission.

3 **Q. MR. CONNELL, WERE YOU ASKED TO DO ANY FURTHER WORK WITH**
4 **REGARD TO THE LOCATION OF THE 100 kV DOUBLE CIRCUIT LINE**
5 **WHICH WAS ORIGINALLY KNOWN AS THE DARBY LINE - 44 100 kV?**

6 **A.** Yes. I was asked to determine if the line shown on the exhibit attached to the
7 Order issued by the Commission (Order No. 15,972) was the same line as
8 the Darby Line - 44 100 kV. I was provided with a title examination which
9 indicated that certain real property owned by Duke Energy Corporation (f/k/a
10 Duke Power Company) upon which this line was built was located near the
11 proposed Nason Corporation building site. This indicated to me that the lines
12 in question were the same. I next used Duke Energy Corporation's right-of-
13 way map and an engineering scale to check the location of the Darby Line -
14 44 100 kV on the map which was attached to the Petition and determined that
15 the line noted on the Exhibit was in such close proximity to the Darby Line -
16 44 kV 100 that I was convinced that the lines were the same.

17 **Q. MR. CONNELL, DOES THIS CONCLUDE YOUR TESTIMONY?**

18 **A.** Yes.